

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE LIBOR-BASED FINANCIAL
INSTRUMENTS ANTITRUST LITIGATION

)
)
) MDL No. 2262
)

THIS DOCUMENT RELATES TO:

) Master File No. 1:11-md-2262-NRB
)

THE BERKSHIRE BANK, GOVERNMENT
DEVELOPMENT BANK FOR PUERTO RICO
and DIRECTORS FINANCIAL GROUP
Individually and On Behalf of All Others
Similarly Situated,

) ECF Case
)

Plaintiffs,

) Civil Action No. 12-CV-5723-NRB
) 13-CV-01016-NRB
)

v.

BANK OF AMERICA CORPORATION; BANK
OF AMERICA, N.A.; BANK OF TOKYO
MITSUBISHI UFJ LTD.; BARCLAYS BANK
PLC; BRITISH BANKERS' ASSOCIATION;
BBA ENTERPRISES LTD.; BBA LIBOR LTD.;
CITIGROUP, INC.; CITIBANK, N.A.;
COÖPERATIEVE CENTRALE
RAIFFEISENBOERENLEENBANK
B.A.; CREDIT SUISSE GROUP AG; DEUTSCHE
BANK AG; HSBC HOLDINGS PLC; HSBC
BANK PLC; JPMORGAN CHASE & CO.;
JPMORGAN CHASE BANK, NATIONAL
ASSOCIATION; LLOYDS BANKING GROUP
PLC; HBOS PLC; ROYAL BANK OF CANADA;
THE NORINCHUKIN BANK; THE ROYAL
BANK OF SCOTLAND GROUP PLC; UBS AG;
WESTLB AG; and WESTDEUTSCHE
IMMOBILIENBANK AG,

) **PLAINTIFFS' NOTICE OF**
) **ERRATA AND FILING**
) **CORRECTED CONSOLIDATED**
) **SECOND AMENDED CLASS**
) **ACTION COMPLAINT**
)

Defendants.

TO THE COURT AND ALL PARTIES TO THIS ACTION:

PLEASE TAKE NOTICE that Plaintiffs The Berkshire Bank (“Berkshire”), Government Development Bank for Puerto Rico (“GDB”), and Directors Financial Group (“DFG”) (collectively, “Plaintiffs”) hereby provide notice of errata and correction as follows:

On November 13, 2014, Plaintiffs filed their Consolidated Second Amended Class Action Complaint (“SAC”) and, unbeknownst to Plaintiffs’ counsel, when the SAC was converted from Word to PDF for transmission through the Court’s ECF system, certain figures/graphs were partially removed from the SAC.

Plaintiffs hereby file a Corrected Consolidated Second Amended Class Action Complaint (the “Corrected SAC”) to replace the SAC filed November 13, 2014. The Corrected SAC contains the figures/graphs that only partially appeared in the SAC. Accordingly, *Figures A, B, C, D, E, H, M, N, O, P*, contained in ¶¶ 77, 80, 81, 82, 83, 100, 120, 121, 122 now fully appear in the Corrected SAC. Plaintiffs believe these modifications do not necessitate a formal amendment as they are correcting a technical glitch. Moreover, these figures reflect information already contained in the November 13 filing, and the figures are identical to figures previously placed in the record of the multidistrict litigation through other complaints.

Dated: November 19, 2014

Respectfully Submitted,

POMERANTZ LLP

/s/ Jeremy A. Lieberman

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